

Fill in this information to identify your case:

United States Bankruptcy Court for the:

WESTERN DISTRICT OF VIRGINIA

Case number (if known) Chapter 11

☐ Check if this an amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Innovative Maintenance Services, LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names and doing business as names

3. Debtor's federal Employer Identification Number (EIN) 47-1298934

4. Debtor's address Principal place of business Mailing address, if different from principal place of business

12882 Dearing Ford Road
Altavista, VA 24517

Number, Street, City, State & ZIP Code

Campbell
County

PO Box 714
Altavista, VA 24517

P.O. Box, Number, Street, City, State & ZIP Code

Location of principal assets, if different from principal place of business

Number, Street, City, State & ZIP Code

5. Debtor's website (URL)

6. Type of debtor

☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))

☐ Partnership (excluding LLP)

☐ Other. Specify:

Debtor **Innovative Maintenance Services, LLC**
Name

Case number (if known)

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

2371

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. Check **all** that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☒ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☒ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

- ☒ No.
☐ Yes.

If more than 2 cases, attach a separate list.

District _____
District _____

When _____
When _____

Case number _____
Case number _____

Debtor **Innovative Maintenance Services, LLC** Case number (if known) _____
Name

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor? ☒ No ☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor Relationship
District _____ When _____ Case number, if known _____

11. Why is the case filed in this district? Check all that apply:
- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention? ☒ No ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.
- Why does the property need immediate attention?** (Check all that apply.)
- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____
- Where is the property?** _____
Number, Street, City, State & ZIP Code
- Is the property insured?**
- ☐ No
- ☐ Yes. Insurance agency _____
Contact name _____
Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds . Check one:
- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

14. Estimated number of creditors
- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000 | <input type="checkbox"/> 25,001-50,000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> 5001-10,000 | <input type="checkbox"/> 50,001-100,000 |
| <input type="checkbox"/> 100-199 | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999 | | |

15. Estimated Assets
- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
| <input type="checkbox"/> \$50,001 - \$100,000 | <input type="checkbox"/> \$10,000,001 - \$50 million | <input type="checkbox"/> \$1,000,000,001 - \$10 billion |
| <input type="checkbox"/> \$100,001 - \$500,000 | <input type="checkbox"/> \$50,000,001 - \$100 million | <input type="checkbox"/> \$10,000,000,001 - \$50 billion |
| <input type="checkbox"/> \$500,001 - \$1 million | <input type="checkbox"/> \$100,000,001 - \$500 million | <input type="checkbox"/> More than \$50 billion |

16. Estimated liabilities
- | | | |
|---|---|--|
| <input type="checkbox"/> \$0 - \$50,000 | <input type="checkbox"/> \$1,000,001 - \$10 million | <input type="checkbox"/> \$500,000,001 - \$1 billion |
|---|---|--|

Debtor	Innovative Maintenance Services, LLC	Case number (if known)	
	Name		
	<input type="checkbox"/> \$50,001 - \$100,000	<input type="checkbox"/> \$10,000,001 - \$50 million	<input type="checkbox"/> \$1,000,000,001 - \$10 billion
	<input checked="" type="checkbox"/> \$100,001 - \$500,000	<input type="checkbox"/> \$50,000,001 - \$100 million	<input type="checkbox"/> \$10,000,000,001 - \$50 billion
	<input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> More than \$50 billion

Debtor **Innovative Maintenance Services, LLC**
Name

Case number (if known)

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

**17. Declaration and signature
of authorized
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **March 27, 2024**
MM / DD / YYYY

X /s/ Michael G. Towler

Signature of authorized representative of debtor

Michael G. Towler

Printed name

Title **Managing Partner**

18. Signature of attorney

X /s/ Andrew S. Goldstein

Signature of attorney for debtor

Date **March 27, 2024**

MM / DD / YYYY

Andrew S. Goldstein

Printed name

Magee Goldstein Lasky & Sayers, P.C.

Firm name

Post Office Box 404

Roanoke, VA 24003-0404

Number, Street, City, State & ZIP Code

Contact phone **(540) 343-9800**

Email address **agoldstein@mglspc.com**

28421 VA

Bar number and State

Fill in this information to identify the case:

Debtor name Innovative Maintenance Services, LLC

United States Bankruptcy Court for the: WESTERN DISTRICT OF VIRGINIA

Case number (if known) _____

☐ Check if this is an amended filing

Official Form 202

Declaration Under Penalty of Perjury for Non-Individual Debtors

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 27, 2024

X /s/ Michael G. Towler

Signature of individual signing on behalf of debtor

Michael G. Towler

Printed name

Managing Partner

Position or relationship to debtor

Fill in this information to identify the case:

Debtor name **Innovative Maintenance Services, LLC**
 United States Bankruptcy Court for the: **WESTERN DISTRICT OF VIRGINIA**
 Case number (if known): _____

☐ Check if this is an
 amended filing

Official Form 204**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Internal Revenue Service c/o Annie B. Lowe 200 Granby Street Norfolk, VA 23510-1811		Payroll Taxes				\$118,200.69
Moore's Electrical & Mechanical Construction, Inc. PO Box 119 Altavista, VA 24517				\$72,000.00	\$0.00	\$72,000.00
Frontline Asset Strategies 10550 Deerwood Park Blvd., St. 309 Jacksonville, FL 32256						\$42,978.43
Rudy L. Hawkins Electrical c/o Brian A. Richardson, Esq. 901 E. Byrd Street, Suite 1800 Richmond, VA 23219		Judgment		\$41,718.97	\$0.00	\$41,718.97
National Check Resolution, Inc. 5885 Cumming Hwy STE 108-333 Buford, GA 30518		Collection for Kabbage Funding				\$25,030.12
Sunbelt Rentals/c/o Colin Simpson 1702 N Collins Blvd., # 100 Richardson, TX 75080						\$20,544.61

Debtor **Innovative Maintenance Services, LLC**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Electric Power Inc PO Box 2009 Chester, VA 23831						\$18,389.00
UNMC/Fleetcor/Attn J. Williams, Esq John C. Williams & Associates PO Box 29279 Atlanta, GA 30359						\$11,739.53
Vivid Learning Systems c/o Your Collection Solution, Inc. 151 N Nob Hill Rd PMB 437 Fort Lauderdale, FL 33324						\$10,666.00
American Express c/o Levy Law Firm Co., LPA PO Box 62719 Virginia Beach, VA 23466						\$9,773.26
Sunbelt Solomon Services, LLC Attn: AR Dept. 1922 S MLK Drive Temple, TX 76504						\$9,403.29
Universal Premium PO Box 1239 Covington, LA 70434						\$7,718.44
JB Moore Electrical Contractor, Inc PO Box 4306 969 Airport Road Lynchburg, VA 24502						\$7,615.45
JCL Energy 54 S Sharpsville Ave. Sharon, PA 16146						\$7,372.64
Cintas/c/o M. Frank 10323 Cross Creek Blvd., Suite F Tampa, FL 33647						\$5,899.98
Truist Bank 306-40-06-15 PO Box 85041 Richmond, VA 23285		Overdrawn Account				\$2,851.60

Debtor **Innovative Maintenance Services, LLC**
Name

Case number (if known)

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services,	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Solomon Corporation 103 West Main Street PO Box 245 Solomon, KS 67480						\$2,767.35
Piedmont Community Healthcare HMO PO Box 411131 Boston, MA 02241						\$2,605.64
Virginia Department of Taxation PO Box 1115 Richmond, VA 23218		Taxes				\$2,531.05
Koopers Utility PO Box 746367 Atlanta, GA 30374						\$1,810.48

**United States Bankruptcy Court
Western District of Virginia**

In re **Innovative Maintenance Services, LLC**

Debtor(s)

Case No.
Chapter

11

LIST OF EQUITY SECURITY HOLDERS

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
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Michael G. Towler
PO Box 714
Altavista, VA 24517

DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP

I, the **Managing Partner** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **March 27, 2024**

Signature **/s/ Michael G. Towler**
Michael G. Towler

Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.
18 U.S.C. §§ 152 and 3571.

AMERICAN EXPRESS
C/O LEVY LAW FIRM CO., LPA
PO BOX 62719
VIRGINIA BEACH, VA 23466

AMERICAN EXPRESS
PO BOX 650448
DALLAS, TX 75265

BIBLE ACCOUNTING ENROLLED AGENTS
670 ROANKE ROAD
DALEVILLE, VA 24083

CAMPBELL COUNTY, TREASURER
PO BOX 37
RUSTBURG, VA 24588-0037

CED ALL PHASE DANVILLE
PO BOX 936339
ATLANTA, GA 31193

CINDEE LONG
KOPPERS UTILITY
PO BOX 160
NEWSOMS, VA 23874

CINTAS/C/O M. FRANK
10323 CROSS CREEK BLVD., SUITE F
TAMPA, FL 33647

ELECTRIC POWER INC
PO BOX 2009
CHESTER, VA 23831

FRONTLINE ASSET STRATEGIES
10550 DEERWOOD PARK BLVD., ST. 309
JACKSONVILLE, FL 32256

FUNDBOX
268 BUSH ST., #2821
SAN FRANCISCO, CA 94104

HOME DEPOT
C/O CITI CARDS
PO BOX 790345
SAINT LOUIS, MO 63179

INTERNAL REVENUE SERVICE
C/O ANNIE B. LOWE
200 GRANBY STREET
NORFOLK, VA 23510-1811

JASPER HOLDINGS, LLC
PO BOX 714
ALTAVISTA, VA 24517

JB MOORE ELECTRICAL CONTRACTOR, INC
PO BOX 4306
969 AIRPORT ROAD
LYNCHBURG, VA 24502

JCL ENERGY
54 S SHARPSVILLE AVE.
SHARON, PA 16146

KOOPERS UTILITY
PO BOX 746367
ATLANTA, GA 30374

LIEN SOLUTIONS
PO BOX 29071
GLENDALE, CA 91209

MOORE'S ELECTRICAL & MECHANICAL
CONSTRUCTION, INC.
PO BOX 119
ALTAVISTA, VA 24517

NATIONAL CHECK RESOLUTION, INC.
5885 CUMMING HWY STE 108-333
BUFORD, GA 30518

OFFICE OF COMPLIANCE
PO BOX 27407
RICHMOND, VA 23261

PERSONNEL CONCEPTS
3200 GUASTI ROAD, STE 300
ONTARIO, CA 91761

PIEDMONT COMMUNITY HEALTHCARE HMO
PO BOX 411131
BOSTON, MA 02241

RUDY L. HAWKINS ELECTRICAL
C/O BRIAN A. RICHARDSON, ESQ.
901 E. BYRD STREET, SUITE 1800
RICHMOND, VA 23219

RUDY L. HAWKINS ELECTRICAL
PO BOX 3930
CHESTER, VA 23831

SOLOMON CORPORATION
103 WEST MAIN STREET
PO BOX 245
SOLOMON, KS 67480

SUNBELT RENTALS
PO BOX 409211
ATLANTA, GA 30384-9211

SUNBELT RENTALS/C/O COLIN SIMPSON
1702 N COLLINS BLVD., # 100
RICHARDSON, TX 75080

SUNBELT SOLOMON SERVICES, LLC
ATTN: AR DEPT.
1922 S MLK DRIVE
TEMPLE, TX 76504

TRUIST BANK
306-40-06-15
PO BOX 85041
RICHMOND, VA 23285

UNIVERSAL PREMIUM
PO BOX 1239
COVINGTON, LA 70434

UNMC/FLEETCOR/ATTN J. WILLIAMS, ESQ
JOHN C. WILLIAMS & ASSOCIATES
PO BOX 29279
ATLANTA, GA 30359

VIRGINIA DEPARTMENT OF TAXATION
PO BOX 1115
RICHMOND, VA 23218

VIVID LEARNING SYSTEMS
C/O YOUR COLLECTION SOLUTION, INC.
151 N NOB HILL RD PMB 437
FORT LAUDERDALE, FL 33324

**United States Bankruptcy Court
Western District of Virginia**

In re **Innovative Maintenance Services, LLC**

Debtor(s)

Case No.

Chapter

11

CORPORATE OWNERSHIP STATEMENT (RULE 7007.1)

Pursuant to Federal Rule of Bankruptcy Procedure 7007.1 and to enable the Judges to evaluate possible disqualification or recusal, the undersigned counsel for **Innovative Maintenance Services, LLC** in the above captioned action, certifies that the following is a (are) corporation(s), other than the debtor or a governmental unit, that directly or indirectly own(s) 10% or more of any class of the corporation's(s') equity interests, or states that there are no entities to report under FRBP 7007.1:

Michael G. Towler
PO Box 714
Altavista, VA 24517

☒ None [*Check if applicable*]

March 27, 2024

Date

/s/ Andrew S. Goldstein

Andrew S. Goldstein

Signature of Attorney or Litigant

Counsel for **Innovative Maintenance Services, LLC**

Magee Goldstein Lasky & Sayers, P.C.

Post Office Box 404

Roanoke, VA 24003-0404

(540) 343-9800 Fax:(540) 343-9898

agoldstein@mglspc.com

**United States Bankruptcy Court
Western District of Virginia**

In re **Innovative Maintenance Services, LLC**

Debtor(s)

Case No.

Chapter **11**

STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION

I, **Michael G. Towler**, declare under penalty of perjury that I am the **Managing Partner** of **Innovative Maintenance Services, LLC**, and that the following is a true and correct copy of the resolutions adopted by the Board of Directors of said corporation at a special meeting duly called and held on the **27th** day of **March**, 2024.

"Whereas, it is in the best interest of this corporation to file a voluntary petition in the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Michael G. Towler, Managing Partner** of this Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter **11** voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Michael G. Towler, Managing Partner** of this Corporation is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Michael G. Towler, Managing Partner** of this Corporation is authorized and directed to employ **Andrew S. Goldstein**, attorney and the law firm of **Magee Goldstein Lasky & Sayers, P.C.** to represent the corporation in such bankruptcy case."

Date **March 27, 2024**

Signed **/s/ Michael G. Towler**

Michael G. Towler

Resolution of Board of Directors
of
Innovative Maintenance Services, LLC

Whereas, it is in the best interest of this corporation to file a voluntary petition in the the United States Bankruptcy Court pursuant to Chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that **Michael G. Towler, Managing Partner** of this Corporation, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that **Michael G. Towler, Managing Partner** of this Corporation is authorized and directed to appear in all bankruptcy proceedings on behalf of the corporation, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the corporation in connection with such bankruptcy case, and

Be It Further Resolved, that **Michael G. Towler, Managing Partner** of this Corporation is authorized and directed to employ **Andrew S. Goldstein**, attorney and the law firm of **Magee Goldstein Lasky & Sayers, P.C.** to represent the corporation in such bankruptcy case.

Date **March 27, 2024** _____

Signed **/s/ Michael G. Towler** _____
